

EXHIBIT 6

From: Montecalvo, Michael <Michael.Montecalvo@wbd-us.com>
Sent: Wednesday, April 3, 2019 10:01 AM
To: Jon Sasser
Cc: Ralph Streza (ralphstreza@me.com); Preetha Suresh Rini; Dean, Jamie
Subject: RE: Communications with Witnesses
Attachments: 2019-03-29 PV Ltr to Martinson enc Subpoena.pdf

Jon,

Thank you for the clarification.

RPD 30 seeks "All Documents that relate to this lawsuit sent to or received by third parties since the lawsuit was filed." Subject to Defendants' objections stated in the July 18, 2018 response, any written communications with the four individuals have been produced (other than the cover letter to the March 29 subpoena including Ms. Martinson's witness fee payment). A copy of that letter is attached.

RPD 40 seeks "All Documents containing communications from or to third parties that related to including Shirley Teter in Video I."

There are no documents of communications with those four individuals about including Teter in Video 1.

RPD 48 seeks "All Documents sent or received from third parties requesting information on plaintiff Shirley Teter." Any responsive documents have been produced.

-Mike

From: Jon Sasser [mailto:Jon.Sasser@elliswinters.com]
Sent: Wednesday, April 03, 2019 8:59 AM
To: Montecalvo, Michael
Cc: Ralph Streza (ralphstreza@me.com); Preetha Suresh Rini; Dean, Jamie
Subject: RE: Communications with Witnesses

Mike,

We requested these communications in Plaintiff's requests for Production Nos. 30, 40, and 48, along with Jamie Dean's express agreement in his e-mail of October 30, 2018. Can you confirm that you have produced all such communications?

Thanks,

Jon

From: Montecalvo, Michael [mailto:Michael.Montecalvo@wbd-us.com]
Sent: Tuesday, April 2, 2019 4:49 PM
To: Jon Sasser

Cc: Ralph Streza (ralphstreza@me.com); Preetha Suresh Rini; Dean, Jamie
Subject: RE: Communications with Witnesses

Jon,

Please help me understand the discovery requests you are referring to that requires the disclosure of the information requested below.

Thanks,

-Mike

From: Jon Sasser [mailto:Jon.Sasser@elliswinters.com]
Sent: Tuesday, April 02, 2019 4:19 PM
To: Montecalvo, Michael
Cc: Ralph Streza (ralphstreza@me.com); Preetha Suresh Rini; Dean, Jamie
Subject: RE: Communications with Witnesses

Mike,

That is not what I asked. Has Veritas' counsel communicated with Carol Martinson, Jo Comerford, Joel Pollak, or Brittney Rivera? If so, have you produced all correspondence with each of them? If not, why not?

Thanks,

Jon

From: Montecalvo, Michael [mailto:Michael.Montecalvo@wbd-us.com]
Sent: Tuesday, April 2, 2019 3:43 PM
To: Jon Sasser
Cc: Ralph Streza (ralphstreza@me.com); Preetha Suresh Rini; Dean, Jamie
Subject: RE: Communications with Witnesses

Jon-

I checked and confirmed Defendants produced all communications requested by Plaintiff in discovery.

-Mike

Michael Montecalvo
Partner
Womble Bond Dickinson (US) LLP

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From: Jon Sasser [mailto:Jon.Sasser@elliswinters.com]
Sent: Tuesday, April 02, 2019 3:03 PM
To: Montecalvo, Michael; Dean, Jamie
Cc: Ralph Streza (ralphstreza@me.com); Preetha Suresh Rini
Subject: Communications with Witnesses

Mike and Jamie,

Have you communicated with Carol Martinson, Jo Comerford, Joel Pollak, or Brittney Rivera? If so, have you produced all correspondence, including e-mail, texts, FaceBook Messenger, and Slack with each of them? If not, why not?

Thanks,

Jon

Jon Sasser

jon.sasser@elliswinters.com

P 919.865.7002 | F 919.865.7010

<image001.png>

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March 29, 2019

VIA HAND DELIVERY

Ms. Carol Martinson
612 E. 19th Street, Apt. #1
Cheyenne, Wyoming 82001

Re: *Shirley Teter v. Project Veritas Action Fund, Project Veritas, and James E. O'Keefe, III*, In the United States District Court for the Western District of North Carolina, Civil Action No. 1:17-CV-00256-MR-DLH

Dear Ms. Martinson:

As you know, I represent Project Veritas Action Fund, Project Veritas, and James E. O'Keefe, III in a lawsuit filed by Shirley Teter. Enclosed please find a Subpoena for your appearance at a deposition to be held on Monday, April 8, 2019 at 9:00 a.m. at the law offices of Crowley Fleck PLLP, located at 237 Storey Boulevard, Suite 110. I am also enclosing a check in the amount of \$44.06 as required by the federal court rules for your appearance and mileage.

If you have any questions, please call me. Thank you for your cooperation in this matter.

Yours truly,

A handwritten signature in dark ink, appearing to read "Michael Montecalvo", is written over a light, circular background.

Michael Montecalvo

MM/acg
Enclosures

WOMBLE BOND DICKINSON (US) LLP

One West Fourth Street
Winston-Salem, NC 27101

No. 98091

66-112/531

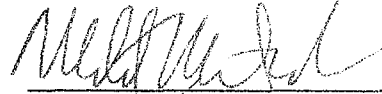
Date: 3/29/2019

\$44.06

Forty-four-----DOLLARS 06 CENTS

PAY
TO THE
ORDER
OF

CAROL MARTINSON



Two Signatures Required for Amounts in Excess of \$1,000.00

Branch Banking and Trust Company

VOID AFTER 180 DAYS

⑈0000098091⑈ ⑆053101121⑆ 0005112916964⑈

| Invoice Date | Invoice # | Payment Amt | Invoice Narrative |
|--------------|--------------------|-------------|-------------------------|
| 3/29/2019 | MARTINSC/2019-0329 | \$44.06 | Witness fee and mileage |